

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:	§	CASE No. 24-33835-MVL
	§	
GENESIS NETWORKS TELECOM SERVICES, LLC,	§	
	§	
DEBTOR.	§	CHAPTER 7

---

**WITNESS AND EXHIBIT LIST FOR JANUARY 23, 2025 HEARING ON  
MOTION OF FEDEX SUPPLY CHAIN LOGISTICS & ELECTRONICS, INC. FOR ORDER  
DIRECTING RULE 2004 EXAMINATIONS OF (I) THE DEBTOR,  
(II) ENDEAVOR MANAGED SERVICES, INC., (III) SYMBIONT VENTURES LLC F/K/A  
GOODMAN INVESTMENTS HOLDINGS, LLC, AND (IV) JAMES GOODMAN [ECF. No. 63]**

---

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

James E. Goodman (“J.E. Goodman”) and Symbiont Ventures, LLC f/k/a Goodman Investment Holdings, LLC (“Symbiont/GIH”), parties in interest herein, hereby file this Witness and Exhibit List for the January 23, 2025 Hearing on the following matter:

**MATTERS TO BE HEARD:**

*Motion by FedEx Supply Chain Logistics & Electronics, Inc. for Order Directing Rule 2004 Examinations of (i) the Debtor, (ii) Endeavor Managed Services, Inc., (iii) Symbiont Ventures LLC f/k/a Goodman Investments Holdings, LLC, and (iv) James Goodman [Dkt. No. 63] (the “Motion”).*

**J.E. GOODMAN AND SYMBIONT/GIH WITNESSES:**

J.E. Goodman and Symbiont/GIH designate the following witnesses:

1. James E. Goodman;
2. Scott Seidel, chapter 7 Trustee for the bankruptcy estate of Goodman Networks, Inc.
3. Any witness called or designated by any other party;
4. Any rebuttal or impeachment witnesses, as necessary; and
5. Any person present at the Hearing (live or via WebEx)

J.E. Goodman and Symbiont/GIH reserve the right to amend or supplement this list at any time prior to the hearing.

# **J.E. GOODMAN AND SYMBIONT/GIH EXHIBITS<sup>1</sup>**

J.E. Goodman and Symbiont/GIH Exhibits are marked with a “G”

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
G-1	Original Complaint - <i>Seidel v. Hudson Clean Energy, et al.</i> , Adv. Dkt. No. 1 [AP No. 23-03090, Bankr. N.D. Tex.] – Exh A to Dkt. No. 69				
G-2	Original Complaint - <i>Seidel v. Frinzi, et al.</i> , Adv. Dkt. No. 1 [AP No. 24-03039, Bankr. N.D. Tex.] - Exh B to Dkt. No. 69				
G-3	Original Complaint – <i>Seidel v. Symbiont Ventures, LLC</i> , Adv. Dkt. No. 1 [AP No. 24-03054, Bankr. N.D. Tex.] - Exh C to Dkt. No. 69				
G-4	Original Complaint – <i>Seidel v. Genesis Networks Global Services, LLC, et al.</i> , Adv. Dkt. No. [AP No. 24-03022, Bankr. N.D. Tex.] - Exh D to Dkt. No. 69				
G-5	Amended Complaint – <i>Seidel v. 18920 NW 11, LLC, et al.</i> , Adv. Dkt. No. 23 [AP No. 23-03072, Bankr. N.D. Tex.] - Exh E to Dkt. No. 69				
G-6	Original Complaint – <i>Seidel v. Unified Field Services, Inc.</i> , Adv. Dkt. No. 1 [AP No. 23-03088, Bankr. N.D. Tex.] - Exh E to Dkt. No. 69				
G-7	Second Amended Complaint – <i>FedEx Supply Chain Logistics &amp; Electronics, Inc. v. James Goodman and Genesis Networks Enterprises, LLC</i> , Dkt. No. 96 [Civil Action No. 2:22-cv-2684, N. D. Tex.] – Exh G to Dkt. No. 69				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

<sup>1</sup> J.E. Goodman and Symbiont/GIH respectfully request that the Court take judicial notice that Exhibits G-1 through G-6 are all pleadings in adversary proceedings related to the bankruptcy case of *In re: Goodman Investment Holdings, Inc.*, Case No. 22-31641, in which Judge Larson presides; Exhibit G-7 is a Northern District of Texas U.S. District Court pleading.

J.E. Goodman and Symbiont/GIH reserve the right to amend or supplement this list at any time prior to the hearing.

Dated January 20, 2025

**PULMAN, CAPPUCCIO & PULLEN, LLP**  
2161 NW Military Highway, Suite 400  
San Antonio, Texas 78213  
[www.pulmanlaw.com](http://www.pulmanlaw.com)  
(210) 222-9494 Telephone  
(210) 892-1610 Facsimile

By: /s/ Randall A. Pulman

Randall A. Pulman  
Texas State Bar No. 16393250  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)

**ATTORNEYS FOR JAMES E. GOODMAN AND  
SYMBIONT VENTURES, LLC F/K/A GOODMAN  
INVESTMENT HOLDINGS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of January, 2025, a true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system:

/s/ Randall A. Pulman

Randall A. Pulman